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DOLLAR TREE STORES, INC.

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

17 KASSONDRA BAAS and KELLY LOFQUIST,  
18 individually and on behalf of all others  
similarly situated,

19 Plaintiffs,

20 v.

21 DOLLAR TREE STORES, INC.,

22 Defendant.

CASE NO. C 07-03108 JSW (ENE)

**DECLARATION OF CHARLOTTA  
JACOBSON-ALLEN**

**DATE:** April 4, 2008

**TIME:** 9:00 a.m.

**DEPT.:** Crtrm. 2, 17th Floor

**JUDGE:** Hon. Jeffrey S. White

**COMPLAINT FILED:** June 13, 2007

**TRIAL DATE:** No date set.

1 I, Charlotta Jacobson-Allen, declare as follows:

2 1. I am over the age of eighteen and have personal knowledge of the facts  
3 set forth below. If called upon as a witness, I could testify competently thereto.  
4

5 2. I am employed by Williams Mullen, P.C. as a paralegal.

6 3. Paula Brady, a Human Resources Paralegal with Dollar Tree provided me  
7 with punch audit reports for stores 1868, 1561, 1878, 1990, and 2939. Plaintiffs worked  
8 at store 1868, while the remaining stores were within the same district as store 1868.

9 4. The audit reports identify all time entries made by any given employee in a  
10 store, as well as any adjustment made to that time entry, the person who made the  
11 adjustment and the date on which the adjustment was made.  
12

13 5. I identified any adjustment to a time entry which appeared to take time  
14 away from the actual time an employee worked.

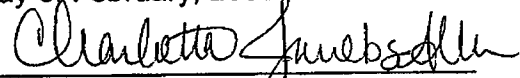
15 6. A summary of the adjustments made to stores 1561, 1878, 1990 and 2939  
16 are attached hereto as Exhibit A.

17 7. A summary of the adjustments made to Ms. Baas's entries (Store 1868)  
18 are attached hereto as Exhibit B.  
19

20 8. A summary of the adjustments made to Ms. Lofquist's entries (store 1868)  
21 are attached hereto as Exhibit C.

22 I declare under penalty of perjury under the laws of the Commonwealth of Virginia  
23 that the foregoing is true and correct.

24 Executed in Norfolk, Virginia this 29<sup>th</sup> day of February, 2008.

25   
26 Charlotta Jacobson-Allen

27 1251470v1

# **EXHIBIT A**

SUMMARY OF CHANGES TO STORE 1561 TIME RECORDS June 2006 - November 2006					
Date	EE Name	Description	Hours Lost	Total Hours Worked - (change)-(punched lunch)	OT AFFECTED
6/5/2006	Guntz, A	Solis changes SS from 13:53 to 14:00	0.12	5.12 - .12 = 5.00	NO

SUMMARY OF CHANGES TO STORE 1878 TIME RECORDS June 2006 - November 2006				
Date	EE Name	Description	Hours Lost Equals (-change)-(punched lunch)	Total Hours Worked
NO CHANGES TOOK AWAY TIME				

SUMMARY OF CHANGES TO STORE 1990 TIME RECORDS June 2006 - November 2006						
Date	EE Name	Description	Hours Lost	Equals	Total Hours Worked -(change)-(punched lunch)	OT Affected
6/13/2006	Prado, G	SS (5:28) Punch is changed to 5:30 by Anna Belarski	0.03	2 Minutes	8.03 - (.03) - (.50) = 7.5	Yes
6/22/2006	Miller, L	SS (12:30) & ES (12:44) Punches are marked ignore by Linda Campbell. New SS is physically punched at 16:26 while the rest of this Shift is Manual.	0.23	14 Minutes	?	No
Total Overtime Deducted (Time + 1/2)			0.03	2 Minutes		
KEY						
SS = Start Shift						
SL = Start Lunch						
EL = End Lunch						
ES = End Shift						

SUMMARY OF CHANGES TO STORE 2939 TIME RECORDS June 2006 - November 2006						
Date	EE Name	Description	Hours Lost	Equals	Total Hours Worked (-change)-(punched lunch)	OT AFFECTED
7/27/2006	Degrasso, A	Appears to work 2 shifts 2nd SS Changed by Lopez			1st Shift = 1.38 hrs 2nd Shift = 4.98 -.40 =4.58	NO
10/6/2006	Berumen, C	SS Changed by Runnings	0.05	3 minutes	8.55 -(.05) = 8	YES
Total Overtime Deducted (Time + 1/2)				0.05	3 minutes	
KEY						
SS = Start Shift						
SL = Start Lunch						
EL = End Lunch						
ES = End Shift						

## **EXHIBIT B**



SS = Start Shift  
SL = Start Lunch  
EL = End Lunch  
ES = End Shift

**EXHIBIT C**

SUMMARY OF CHANGES TO LOFQUIST HOURS				
Date	Description	Hours Lost	Equals	Total Hours Worked (-change)-(physical lunch)
11/27/2006	Hansen Manual Lunch & Changed ES	0.68	71 minutes	$9.18 - (.68) - (.5) = 8$
Total OT		0.68		